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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
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Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' MOTION RE: SEALING
 PORTIONS OF PLAINTIFFS' REPLY IN
 SUPPORT OF REQUEST FOR AN
 ORDER FOR GOOGLE TO SHOW
 CAUSE RE: DISCOVERY
 MISCONDUCT**

The Honorable Susan van Keulen
 Courtroom 6 – 4th Floor
 Date: April 21, 2022

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC (“Google”)’s material should be sealed. This material is included in Plaintiffs’ Reply in Support of Their Motion for Order Requiring Google to Show Cause Why It Should Not Be Sanctioned for Discovery Misconduct (“Reply”). The material has been designated by Google as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only.” This motion to seal pertains to the following information in the Reply:

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Reply Brief	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Declaration of Mark C. Mao in Support of Plaintiffs’ Reply (“Mao Reply Decl.”)	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Exhibits 1-6 of the Mao Reply Declaration	Google	Entirety	Material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Declaration of Christopher Thompson (“Thompson Decl.”)	Google	Entirety	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Exhibits B-D of the Thompson Declaration	Google	Entirety	Material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

1 Dated: April 11, 2022

Respectfully submitted,

2 By: /s/ Mark Mao

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